

1 from TBN so that it can then make \$1.5 million loan available
2 to Community Brace?

3 A I would think that would be the proper
4 interpretation of it and it's kind of like me. I owe the bank
5 and I'm borrowing some more this week.

6 Q Did you -- did it give you any pause that perhaps
7 the money should have come directly from TBN as opposed from
8 National Minority TV?

9 A No, I can't truthfully say that I thought about
10 that. I may be the kind of person who jumps without checking
11 the water. The only thing I knew was that there was a
12 possibility of getting a MESBIC license and operating in south
13 central Los Angeles and of which, I'm sure all of you are
14 aware, which would have made millions of dollars available
15 through government-matching funds to loan to minorities in
16 business. Now, that's all I focused on. Now, if I got all of
17 that from TBN and I was sure that I couldn't get it from them
18 unless I could get it from them, but if I got all of that from
19 TBN, fine. If I got some of that from Minority, fine. I'm a
20 what do you call it that sucks up water, I'm a sponge. I'm a
21 sponge and if you tell me that there's a \$1,000,000 available
22 in Alaska that I can get to south central Los Angeles, I'm
23 catching Alaska Airlines when I leave here and I might add and
24 I'm not on the payroll of any of those things.

25 Q So basically, am I correct, that you understood that

1 the money that Community Brace was seeking was essentially
2 going to come from TBN regardless of the appearance that it
3 might be funneled through NMTV?

4 A Yeah, I would say that yes.

5 Q All right, now, I'd like to focus your attention on
6 Bureau Exhibit 412 and specifically the fourth paragraph that
7 concerns the forgiveness of the debt to Prime Time Christian
8 Television.

9 A Yes, I have it.

10 Q You got it? Okay, at the time that you voted to
11 forgive Prime Time's debt to NMTV, were you aware of NMTV's
12 financial situation?

13 A Yes, I was.

14 Q So you knew at that point that NMTV owed TBN in
15 excess of \$5,000,000?

16 A Yes -- now, in excess -- yes, yes.

17 Q In view of NMTV's debts did you or any other board
18 members consider whether it would have been more prudent for
19 NMTV to restructure the debt owed by Prime Time rather than
20 forgive in its entirety that debt?

21 A That was discussed, that was discussed.

22 Q Were you aware of what plans Prime Time had in the
23 event its debt to NMTV were forgiven?

24 A Yes.

25 Q And what were those plans?

1 A They were going to continue to use it and to --
2 instead of the money that they would have been paying back to
3 us as they got it to acquire other stations.

4 Q What other stations were they going to acquire?

5 A As many low-powered in that area as they could.

6 Q In that area meaning west Texas and New Mexico?

7 A West Texas, New Mexico.

8 Q And what programming were those stations going to
9 use?

10 A Well, all -- I'm sure they'd use the same format,
11 they would attempt --

12 Q Whatever was TBN, correct?

13 A They would attempt to get the TBN three-hour
14 national which would have brought national television and then
15 they would have used their own local programs to fill in the
16 rest of that time, whether they were twelve-hour or twenty-
17 four-hour.

18 Q And that's an assumption on your part though, isn't
19 it?

20 A Yes.

21 Q But in terms of TBN programming, did you have any
22 knowledge that Prime Time would have utilized TBN's
23 programming on the new stations that it was going to acquire?

24 A No, I had no knowledge, I also had no knowledge of
25 no -- none of our stations that doesn't make as their prime

1 target trying to get TBN.

2 Q That wasn't what I was asking about.

3 A Yeah.

4 Q Perhaps, if you don't know, that's fine, you can say
5 so.

6 A No, I don't know.

7 Q So you don't know what Prime Time's plans were
8 outside of acquiring other low-power stations in west Texas
9 and New Mexico --

10 A No, that's right.

11 Q -- if this debt were forgiven?

12 A That's right.

13 JUDGE CHACHKIN: When you say here the directors
14 considered the common Christian values and objectives of the
15 two corporations, what would -- what discussion did you have
16 in that regard?

17 MR. HILL: Well, we felt that even if we did not
18 recover the \$600,000 and some thousand dollars, if this
19 corporation or this person could expand Christian television
20 to reach many, many more thousands of people with the money
21 that they would have tried to pay us back, we thought that was
22 a greater value.

23 JUDGE CHACHKIN: And by Christian television, did
24 you have in mind any particular individual programming?

25 MR. HILL: No, no, no, just the general -- well, the

1 general program would take in the local people and as many
2 national people as possible and as many programs as the local
3 advisory committee would insist on.

4 JUDGE CHACHKIN: Well, did you know that TBN -- did
5 you know whether or not TBN was then being carried by the
6 Odessa station?

7 MR. HILL: No, I don't know it, my -- I would be
8 willing to bet and I'm not a betting person, but I would say,
9 yes, but I wouldn't know it. No, I wouldn't know it.

10 JUDGE CHACHKIN: All right, we'll take a --

11 MR. HILL: It's almost like a -- in my area, nobody
12 would build a shopping center that didn't have certain anchor
13 stores, one being Ralph's, you just wouldn't build a shopping
14 center without even Ralph's or Boy's and you just don't hardly
15 have a Christian television station throughout the country
16 that doesn't try to get TBN's three hours.

17 JUDGE CHACHKIN: All right, we'll be in recess until
18 1:30.

19 (Whereupon, a lunch recess was taken to reconvene at
20 1:30 p.m.)

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A F T E R N O O N S E S S I O N

JUDGE CHACHKIN: Back on the record. Mr. Shook.

BY MR. SHOOK:

Q Reverend Hill, before lunch I had gone over with you a list of stations that were low-power stations that National Minority had and do you recall not all the particulars of that exhibit, but do you recall there was a long list of stations there?

A Yes.

Q And had you had an opportunity to look at the places for which National Minority had stations?

A No, I can from my mind --

Q Okay.

A -- and I don't have -- yeah.

Q Let me direct your attention then to the exhibit, it's Exhibit 105, Tab K.

A Yeah.

Q TBN's Exhibit 105, Tab K.

A Here they are right here.

Q Now, those places that have stations have designations in the right-hand portion that would have a number beginning with either -- or a letter beginning either with a "W" or a "K" and then followed by some numbers and then additional letters so you can match up which markets have stations. You see that?

1 A Yes.

2 Q Now, and you can take your time before you answer
3 this. For all the stations that you see there, are you aware
4 of any of them that originate their own programming?

5 A Now, may I ask a question? When you said that
6 originate their own programming they -- in other words, they
7 are stationed like onto the one we have up there that has its
8 own program and not directed by Minority Television or TBN?

9 Q Well, sir, my question perhaps presupposes that you
10 have knowledge as to what programming those stations are, in
11 fact, broadcasting.

12 A No, I have -- I don't recognize and I could not say
13 which one of these has their own program.

14 Q Now, would it be fair to state that you have no
15 knowledge as to what programming any of those stations has?

16 A I'm not in the position to say from my mind, I may
17 have some records and yet I don't recall, I don't recall me,
18 in the minutes or anywhere, saying this is a station, this is
19 a station, this is a station, I don't recall. Now, that may
20 happen.

21 Q If I were tell you that every single station there
22 broadcasts only TBN programming, would that be a true
23 statement in your mind?

24 A I wouldn't think so.

25 Q You wouldn't think so.

1 A No, I wouldn't think so.

2 Q And why would you not think so?

3 A Because by the very makeup of the stations, they
4 have to involve local programming. TBN, for the most part,
5 has its three-hour national program. They have to involve
6 local programming, they have to involve local supporters,
7 local -- supporters. I have travelled and in most cases they
8 have their local men who run and what have you and I would not
9 say so. I would say that whatever station where TBN --
10 they're not a station -- if it's Poughkeepsie and all of
11 those, I would say they'd by like Poughkeepsie, they have
12 local programming, they divert to the national three hours,
13 they go back to local people.

14 Q Do you have any knowledge of any distinctions that
15 exist between the requirements for full-power television
16 stations and low-power television stations with respect to
17 programming?

18 A No, I don't other than the low-powered stations,
19 according to the definition -- as you remember, I said I was
20 not even aware of what the differences were -- the low-powered
21 stations seem to be the smaller stations of a smaller area and
22 they generally are under the local people even more than the
23 high-powered stations.

24 Q All right, so if I understand your understanding
25 here is that each of these stations at least puts out the

1 Praise the Lord program which is that Monday through Friday
2 program that runs for three hours in prime time in the evening
3 but you're not certain of what other programming any of these
4 stations might have?

5 A No, I'm not.

6 JUDGE CHACHKIN: You have no knowledge what these
7 other stations --

8 MR. HILL: I have no knowledge.

9 JUDGE CHACHKIN: You -- in fact, you had no
10 knowledge of the existence of these stations, did you, that
11 NMTV had been authorized these stations?

12 MR. HILL: No, sir, I could not look at this list
13 and say that's an MTV, this is an M --

14 BY MR. SHOOK:

15 Q Other than National Minority TV, have you served on
16 the board of any company which holds broadcast licenses issued
17 by the FCC?

18 A No, sir.

19 Q Have you ever been advised what the responsibilities
20 are of a member of the board of directors of a non-profit
21 corporation which holds broadcast licenses issued by the FCC?

22 A No specific advise.

23 Q Have you been provided any general advise?

24 A Yes, I have been questioned in terms of whether or
25 not I had any conflict, you know, of there were any type of

1 conflict where I could not serve on the board.

2 Q You mean conflict between what and what?

3 A Well, when I was asked, I don't know what they
4 defined the conflict with. One was that was I a part of any
5 other stations, did I own a radio station, a television
6 station and things like that or had I been a part -- I
7 remember a question, had I been a part of one that filed and
8 didn't go through, that was found unworthy of going through.
9 That was the general conversation that I had with Paul just --
10 in other words, as Paul said that is there anything that we
11 should know now, you know, if we submit your name.

12 Q Has it ever been the subject of discussion at a
13 meeting of the board of directors of NMTV whether NMTV
14 stations should utilize a source of programming other than TBN
15 programming?

16 A Yes.

17 Q And what happened?

18 A It has been encouraged and I think I have been in
19 the first one or two meetings -- my greatest encouragement has
20 been that the manager go out and involve minorities, a
21 minority advisory board, a minority training program and
22 particularly a minority hiring program.

23 Q And what, if anything -- besides what happened with
24 the advisory board in Portland, what, if anything, are you
25 aware in terms of a follow-up to your recommendation?

1 A Well, of course, there would be more than the
2 advisory board in Portland. First of all, I think the hiring
3 of minorities in the Portland office. It is my understanding
4 that we have either nine or ten.

5 Q Nine or ten what?

6 A Minority full-time employed people.

7 Q And how did you acquire that understanding?

8 A By I asked, I'm sure I asked Paul or Jane, Jane I
9 believe. Second of all, that it is given to us in report that
10 -- and I'm not specific, that some type of training program is
11 starting with training in television through possibly the
12 JEPTA program so that minorities can qualify for jobs in the
13 television stations.

14 Q All right, so that the record is clear, what program
15 are you referring to?

16 A I'm referring to training programs.

17 Q Well, you said -- there was a term --

18 A JEPTA, JEPTA, that's job -- it's J E P T A, it's a
19 government program where they -- where, you know, the kids get
20 stipend as you train them and I believe that's the program
21 that they're doing but it's all under the advisory board.

22 Q Now, have -- I think there was some testimony early
23 on about -- in response to questions from Mr. Cohen about your
24 having attended rallies for TBN in various locations?

25 A Yes.

1 Q Have you ever attended rallies in Houston, Texas?

2 A No, I canceled, I was sick. We had a big rally, a
3 huge rally there but I've never been to a TBN rally and -- to
4 my knowledge, to my recollection, that was canceled.

5 Q It was canceled because you were sick?

6 A Yes, because I was ill, I had that twenty-four --

7 Q And when did this --

8 A That would have been about two years ago, that would
9 be at the Oasis Church.

10 Q Okay, and what was supposed to happen?

11 A Okay, first of all, the place was jammed, it holds
12 about 9,000 people and, of course, there were singers, there
13 was the Tripp Family, there was the soloists, a Stanley
14 Stapleton. It had a regular service and I did the preaching,
15 I was to do the preaching.

16 Q And this was supposed to be broadcast in some way?

17 A Oh, yes, that's broadcast live. TBN, not Minority
18 Television now, TBN goes from city to city where it has
19 stations or where it's opening a station or like in Dallas it
20 just opened the International Translating Station. I preached
21 the dedication of the --

22 Q Right, no, my focus right now is just on Houston and
23 so there was --

24 A Yes.

25 Q Now, did the rally actually take place or was it --

- 1 A Yes, the rally took place.
- 2 Q But you just weren't there.
- 3 A I wasn't there, I couldn't go.
- 4 Q Very good. Do you know --
- 5 A Now -- wait a minute, wait a minute. Now, I have
- 6 preached at Station 14 without Paul and Jane because they
- 7 have, you know, they have to raise their budget for that
- 8 station. Now, I have preached for Station 14 twice but this
- 9 wasn't a Paul and Jane rally, this was a local Station 14
- 10 rally.
- 11 Q That's Station 14 in Houston.
- 12 A That's right.
- 13 Q And when did that take place?
- 14 A I would say that took place this year, I was there
- 15 this year and -- two years in a row.
- 16 MR. SHOOK: Your Honor, I have no further questions.
- 17 JUDGE CHACHKIN: Any redirect?
- 18 MR. TOPEL: Yes, sir, just one moment.
- 19 REDIRECT EXAMINATION
- 20 BY MR. TOPEL:
- 21 Q Pastor Hill, could you find in the materials in
- 22 front of you Mass Media Bureau Exhibit 388?
- 23 A This would be this one. Well, have to go back to 6.
- 24 I can tell my congregation about this. 3 --
- 25 Q 388, and turn please to page -- I'm giving you --

1 yes, turn please to page 2, pages 2 and 3, Mass Media Bureau
2 Exhibit 388.

3 A Okay, pages 2 and 3.

4 Q What you should have in front of you is a letter
5 dated January 28, 1992 to you from Jane Duff?

6 A All right, wait just a minute, I have to -- that 89
7 -- here, here, I'm sorry, 88 -- yes, yes.

8 Q Do you have in front of you a letter to you from
9 Jane Duff dated January 28, 1992?

10 A Yes, yes.

11 Q Okay, and that is Bureau Exhibit 388, page 2. Can
12 you take a moment to look at page 2 and then turn the page and
13 look at page 3 and let me know when you familiarize yourself
14 with those pages?

15 A All right.

16 Q And have you looked at it? Do you recall receiving
17 that letter from Mrs. Duff?

18 A To be right frank with you, I don't recall receiving
19 the letter, the cover letter. Early in my testimonies when I
20 requested list of stations I do recall receiving this list of
21 stations, I don't recall indicating those that were on there
22 going on in eighteen months and whatever, I'm sorry, I don't
23 recall. I recall this list more than I do this letter.

24 JUDGE CHACKIN: Now, this list you're referring to,
25 what page?

1 MR. HILL: Page 3, it has stations on the air.

2 JUDGE CHACHKIN: I see that.

3 MR. HILL: Yeah.

4 JUDGE CHACHKIN: Just wanted to identify it for the
5 record.

6 MR. HILL: Um-hum.

7 JUDGE CHACHKIN: Go ahead.

8 BY MR. TOPEL:

9 Q What did you understand the entry stations on the
10 air to refer to?

11 A To be very frank with you and I'm sorry, I just
12 simply associated that with my request for knowing the
13 stations that were available as I testified -- testified
14 earlier. I don't recall doing any in depth consideration of
15 this letter.

16 MR. TOPEL: Your Honor, I'd like to have marked for
17 identification as TBF Exhibit 117 the document -- exchanging
18 and I've given the Court Reporter two copies. It is a letter
19 from Cal E. Burton to Mr. Norman Juggert dated February 10,
20 1993 consisting of two pages and ask that it be marked for
21 identification as TBF Exhibit 117.

22 JUDGE CHACHKIN: The document described will be so
23 marked.

24 (Whereupon, the document referred to
25 as TBF Exhibit 117 was hereby marked

1 for identification.)

2 MR. COHEN: Your Honor, could I ask a question, this
3 concerns the post-discovery material we received from Trinity,
4 could I ask Mr. Topel a question?

5 JUDGE CHACHKIN: All right.

6 MR. COHEN: Was this is the --

7 MR. TOPEL: Yes.

8 MR. COHEN: My question, Your Honor, is -- was this
9 document in a packet that Mr. Topel provided me.

10 MR. TOPEL: That was going to be my next statement,
11 Your Honor, this document was included in the package of
12 materials that was produced to Mr. Cohen --

13 MR. COHEN: Thank you, thank you.

14 MR. TOPEL: -- the Bureau counsel in advance of this
15 hearing, this is not a new document.

16 MR. COHEN: Thank you very much, and thank you, Your
17 Honor, for letting me ask.

18 JUDGE CHACHKIN: Yes.

19 BY MR. TOPEL:

20 Q Pastor Hill, if you turn to the second page, there's
21 a reference to you receiving a copy of this letter, is that
22 reference correct?

23 A Yes.

24 Q Okay, you did receive this letter and you're
25 familiar with it?

1 A Yes.

2 Q Can -- would you take a look, please, at the first
3 three sentences of the letter and my question to you is going
4 to be, did Community Brace -- do those letters as -- do those
5 sentences accurately reflect what Community Brace did?

6 MR. COHEN: Your Honor, I -- I don't object to the
7 area but I object to the form of the question. Did, meaning
8 did in connection with what? I don't understand the question,
9 Your Honor.

10 JUDGE CHACHKIN: Well, I'll sustain the objection.

11 BY MR. TOPEL:

12 Q Pastor Hill, is this a -- whether an accurate copy
13 of a letter that Community Brace -- Mr. Burton, on behalf of
14 Community Brace sent to Norman Juggert on the date stated?

15 A To the best of my knowledge, this is an accurate
16 copy of the letter.

17 MR. TOPEL: Your Honor, I move Exhibit 117 --

18 JUDGE CHACHKIN: On the grounds that it's an
19 accurate copy of the letter or --

20 MR. TOPEL: Well, the con -- the letter speaks for
21 itself.

22 JUDGE CHACHKIN: Well, let me find out if there's
23 any objection.

24 MR. COHEN: Well, Your Honor, let me mention that
25 this is part of a packet, as Mr. Topel said, what I'd propose

1 to do -- what --

2 JUDGE CHACHKIN: You mean this is included in your
3 package?

4 MR. COHEN: That's right, I was going to --

5 MR. TOPEL: Mr. Cohen, was it, Mr. Cohen.

6 MR. COHEN: I thought you said to me it was included
7 in the package.

8 MR. TOPEL: It's included in what I exchanged with
9 you, I'm not sure if it was in with yours produced as an
10 exhibit here.

11 MR. COHEN: Well, I produced everything you gave me
12 so if you did, it was -- can I just have minute to check, Your
13 Honor.

14 JUDGE CHACHKIN: Yes.

15 MR. TOPEL: Well, then I don't --

16 MR. COHEN: Well, let me just confirm that, I don't
17 want to say something that's not accurate. I don't think it's
18 been withdraw -- let me just look at it without -- can we go
19 off the record, Your Honor?

20 JUDGE CHACHKIN: Well, the last document you have is
21 February 6th -- January 6th in your package. We're off the
22 record.

23 (Off the record.)

24 JUDGE CHACHKIN: Is that -- well, we'll go back on
25 the record. Mr. Cohen has indicated that Glendale -- there's

1 no objection, what's the Bureau's position?

2 MR. SHOOK: We have no objection, I understand this
3 to be simply the last event that deals with the Community
4 Brace saga.

5 JUDGE CHACHKIN: All right, Trinity Exhibit 117 is
6 received.

7 MR. COHEN: That's 117, Your Honor.

8 JUDGE CHACHKIN: Yes.

9 MR. COHEN: Okay.

10 (Whereupon, the document previously
11 identified as TBF Exhibit 117 was
12 hereby received into evidence.)

13 BY MR. TOPEL:

14 Q Pastor Hill, I just want to show you two documents
15 that Mr. Cohen showed you. One is a document entitled
16 "Consolidated Opposition to Petition to Deny" and I believe
17 Mr. Cohen asked you if you had -- a copy of that had been sent
18 to you and my question to you is, do you see on the first page
19 of that letter, the na -- of that document, the name Tyrone
20 Brown?

21 A Yes.

22 Q Okay, and I'd like to show you Glendale Exhibit 219
23 which is the March 30, 1992 letter from the FCC to National
24 Minority TV --

25 MR. COHEN: What exhibit number is that?

1 MR. TOPEL: Glendale Exhibit 219.

2 MR. COHEN: No, I don't have an exhibit that high.

3 Oh, yes, I do, wait a minute, excuse me. Can I -- is that
4 something that as offered later -- this -- oh, that's the
5 Bureau, oh, that's the commissioner -- okay.

6 BY MR. TOPEL:

7 Q And do you see on that letter that a carbon copy was
8 sent to Tyrone Brown?

9 A Yes.

10 Q Okay, can you tell me, who is Tyrone Brown and what
11 understanding, if any, do you have about what his involvement
12 is with respect to these documents?

13 A When we were discussing the legal matters
14 confronting us and I'm now saying the case that's before us,
15 TBN and it's relationship with Minority Television, I made the
16 suggestion that I would like to see TBN involve an attorney
17 living in Washington, a minority attorney who had had FCC
18 experience. I had known personally people who worked for FCC.
19 I had known minorities who was acquainted with FCC's position
20 with minorities who were trying to make a breakthrough in
21 television and I'm the one who suggested to ask our attorney
22 here, May, to try to locate an attorney that might be
23 practicing here now, a minority attorney, that might could us
24 some insights as to what we should do or what we shouldn't do.
25 Mr. Brown was the one contacted. He had formerly worked with

1 the FCC, he is a local attorney in Washington, a very
2 distinguished attorney, it's my understanding and TBN
3 contacted him. Mr. May, our attorney here contacted him and
4 he came to our meetings.

5 Q And what understanding did you have about the legal
6 matters about which he was to be advising you?

7 A Well, the legal matter, in a nut shell, as I
8 understand it, is that those who are opposing the licensing or
9 the relicensing of the Florida station is doing it on the
10 basis that TBN in some fraudulent manner had purported to be
11 organizing a minority television station so that they could
12 benefit by getting two additional high-powered stations and
13 that the question of whether or not Trinity Broadcasting
14 Company had, in fact, organized a minority station or, in
15 fact, is Trinity -- is Minority TV Trinity, are they one in
16 the same of did Trinity, in fact, give birth to a minority
17 station. I knew Mr. Rogers -- not Mr. Rogers, I'm sorry, the
18 attorney that's over there, the attorney that we hired, Brown
19 --

20 Q Brown.

21 A -- would clearly be able to tell us without us going
22 through any of this presentation whether or not we had, in
23 fact, done wrong, whether or not TBN had done wrong and
24 whether or not Trinity or whether or not Minority TV, in fact,
25 constituted a minority television station, and therefore we

1 | hired him to look into that aspect.

2 | Q Thank you. My last area, Pastor Hill, who was it
3 | that you pointed to, I think it was the term you used, for the
4 | minority advisory board in Portland?

5 | A Reverend O. B. Williams.

6 | Q Okay, and can you tell me who he is?

7 | A Dr. O. B. Williams is from Port --

8 | Q Or was, he's deceased --

9 | A He was, he's deceased about two months -- three
10 | months. Dr. O. B. Williams, beside being a personal friend,
11 | was the pastor of the Vancouver Avenue First Baptist Church of
12 | Portland for forty-four years and president of the Northwest
13 | Baptist State Convention which constitutes five states in the
14 | northwestern section. I would say O. B. Williams was a person
15 | who knew very well the northwest section of the United States.

16 | Q And my last question, I think, depending on your
17 | answer, how would having O. B. Williams serve on National
18 | Minority Television's minority advisory board serve the mi --
19 | help serve the minority community in Portland?

20 | A First of all, it would give it credibility. Our
21 | community depends -- supports and depends largely on who's
22 | heading it and who's on the board. If I get a letter to a
23 | meeting, the first thing I want to do is read the list of
24 | board members, if I don't know the organization and if I read
25 | that O. B. Williams is on the board, I reread the letter. If

1 not, I'll give it to my assistant and let them answer it. So
2 O. B. Williams -- it's almost like receiving -- would you
3 please excuse me my immodesty, it's almost like a Negro
4 receiving a letter from E. V. Hill in Los Angeles, he would
5 reread it. He wouldn't hand it to an assistant and that's
6 because I've been there thirty-three years.

7 Q I do need to ask you one other question. What kinds
8 of services did you envision that E. V. Hill -- that O. B.
9 Williams could make available to the minority community in
10 Portland through Minority Television's -- National Minority
11 Television's --

12 A He could serve in a two-fold manner. He could
13 serve for Minority Television as a sounding board. You have
14 all kinds of Messiahs who wants to be on television, O. B.
15 Williams could be a good sounding board for the station. He
16 could bring credibility to the station. If O. B. Williams
17 stood in the pulpit of Vancouver Avenue and say, we listen to
18 the station, whatever the number is, then it would ripple
19 throughout the community. If he would say that in his state
20 convention, it would ripple throughout the state convention.
21 In a very large sense, Afro-Americans have a bit of cultism in
22 them, they do follow leadership and he is a leader. Second
23 thing he could do, he could recommend to the station talents
24 and people of honesty and integrity that could help the
25 station and it's advisory board in hiring minorities. He has

1 a great relationship with the NAACP, great relationship with
2 the Urban League. Urban League is an organization that seeks
3 out talented young people to get employed, O. B. Williams
4 would be one of the people.

5 MR. TOPEL: Nothing further, Your Honor.

6 JUDGE CHACHKIN: Any further questions?

7 MR. COHEN: I have just a couple of questions.

8 RE-CROSS EXAMINATION

9 BY MR. COHEN:

10 Q Pastor, with reference to the February 10, 1993
11 letter, do you have a copy of that in front of you? Mr.
12 Topel, can you give him --

13 A We just --

14 Q The one that Mr. Topel asked you about --

15 A Yes, yes, this one right here.

16 Q Yeah.

17 A Um-hum.

18 Q Now, am I correct that that letter was written -- it
19 states it was written -- strike that. Am I correct that that
20 letter was written in response to Mr. Juggert's January 6,
21 1993 letter to Cal Burton?

22 A I'm not aware of any letter that was written other
23 than this one between those time periods.

24 Q And as I mentioned to you during your cross-
25 examination, in the January 6, 1993 letter you will recall

1 that Mr. Juggert suggested that the terms of the investment
2 placed you at risk under the self-dealing provisions of the
3 California Code, do you recall that?

4 A Yes.

5 Q Okay, now, am I correct that the purpose of the
6 February 10, 1993 letter was to deal with that statement --
7 Mr. Juggert?

8 A Well, it did two things.

9 Q Tell me about it.

10 A It said that it had done all of -- looking into all
11 of the areas that Mr. Juggert had referred to, both state, the
12 Department of Commerce which licenses the MESBIC's and
13 everything. It said that it did not agree with it, it -- they
14 did not agree with it, that they would like to take another
15 look at it and that the lawyer who was helping us, Attorney
16 Pillington, has been with them and they had hoped that Mr.
17 Juggert and TBN would have taken a look but their words were
18 final.

19 Q And the first paragraph says in part, "I trust that
20 you will agree to a meeting with the individuals noted above
21 at your earliest convenience."

22 A Yes.

23 Q Did that meeting ever occur?

24 A That meeting never occurred.

25 Q Thank you.